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## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

February 1, 2023

## **BY ECF**

Hon. Colleen McMahon United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Laforest, 21 Cr. 272 (CM)

Dear Judge McMahon:

The Government writes to request a one-week adjournment of the pending February 3, 2023 pretrial submissions deadline for this case. A plea hearing has been scheduled for defendants Sabitri and Garry Laforest before the Hon. Ona T. Wang, U.S. Magistrate Judge, on February 7, 2023. In addition, based on conversations with counsel, the Government anticipates that it is also likely to reach pretrial disposition agreements with the remaining defendants, Tatiana and Sanjay Laforest, imminently.

Accordingly, the Government respectfully requests that the Court adjourn the pretrial submissions deadline by one week, to February 10, 2023, to obviate the need for the parties to file pretrial filings that will be moot and unnecessary assuming Sabitri and Garry Laforest plead as scheduled on February 7, and anticipating that pretrial dispositions are reached with the remaining defendants in the same timeframe. The defendants consent to the adjournment.

Respectfully Submitted,

DAMIAN WILLIAMS United States Attorney

by: <u>/s/ Matthew R. Shahabian</u>
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CC: Counsel of Record (by ECF)